

### **REMARKS**

In the Official Action mailed on August 20, 2004 the examiner reviewed claims 1-46. Claims 1-8, 10, 12-15, 17, 19-21, 23, 30-32, 34, 36, 38, 40-42, and 44-46 were rejected under 35 U.S.C. §102(b) as being anticipated by Henninger et al. (USPN 5,499,371, hereinafter "Henninger"). Claims 9, 16, 22, 33, 35, 37, and 39 were rejected under 35 U.S.C. §103(a) as being unpatentable over Henninger in view of Srinivasan (USPN 5,799,309, hereinafter "Srinivasan"). Claims 11, 18, 24, and 43 were rejected under 35 U.S.C. §103(a) as being unpatentable over Henninger in view of Nicholson et al. (USPN 6,631,519, hereinafter "Nicholson"). Claims 25-28 were rejected under 35 U.S.C. §103(a) as being unpatentable over Henninger in view of Imamura (USPN 5,560,014, hereinafter "Imamura") and further in view of Ng et al. (USPN 6,385,618, hereinafter "Ng"). Claim 29 was rejected under 35 U.S.C. §103(a) as being unpatentable over Henninger in view of Imamura and Ng and further in view of Nicholson.

#### **Rejections under 35 U.S.C. §102(b) and 35 U.S.C. §103(a)**

Claims 1-8, 10, 12-15, 17, 19-21, 23, 30-32, 34, 36, 38, 40-42, and 44-46 were rejected under 35 U.S.C. §102(b) as being anticipated by Henninger. Furthermore, claims 9, 16, 22, 33, 35, 37, and 39 were rejected under 35 U.S.C. §103(a) as being unpatentable over Henninger in view of Srinivasan. Additionally, claims 25-28 were rejected under 35 U.S.C. §103(a) as being unpatentable over Henninger in view of Imamura and further in view of Ng. Finally, claim 29 was rejected under 35 U.S.C. §103(a) as being unpatentable over Henninger in view of Imamura and Ng and further in view of Nicholson.

Applicant respectfully points out that Henninger teaches away from the present invention. Specifically, Henninger teaches that *"the method writes code which when executed will update the foreign key for the related class to point to the primary key of the object instance being created"* (see Henninger, col. 10,

lines 19-22). To rephrase, Henninger teaches that the foreign key for the target object is updated "*to point to the primary key*" of the source object. (Note that the "*object instance being created*" in Henninger is equivalent to the "source object" in the present invention, and a "*related class*" in Henninger is equivalent to a "target object" in the present invention). In other words, the invention in Henninger **provides back references** in the target objects that point back to the primary key in the source object.

The present invention is similarly directed to a system that supports target objects and source objects. However, the present invention does this without providing back references in the target objects. In particular, the present invention generates and executes a SELECT statement on the database, which includes a SELECT clause and a WHERE clause, wherein the SELECT clause does not include a foreign key field, containing a key value for the source object, from each corresponding target table. The SELECT clause contains only other fields in each corresponding target table whose data make up the target object data. Furthermore, the SELECT statement checks the foreign key fields in the WHERE clause to determine a matching key value for the source object, thereby avoiding storing back references to the source objects in the target objects by storing key values for the source object in the foreign key fields which are not returned by the SELECT statement (see page 10, lines 11-32 and page 9 lines 28-31 of the instant application).

Note that back references are detrimental because they are intrusive to the object design and prevent other objects from sharing references to the target object (see page 1, lines 29-35 of the instant application). Hence, it is beneficial to provide target objects without providing any back references.

Accordingly, Applicant has cancelled claims 1-12 and 19-46. Applicant has also amended remaining independent claim 13 to specify how the present invention executes a SELECT statement. These amendments find support on page 10, lines 21-25, and page 9, lines 23-25 of the instant application.

Hence, Applicant respectfully submits that independent claim 13 is presently amended are in condition for allowance. Applicant also submits that 14-18, which depend upon claim 13 are for the same reasons in condition for allowance and for reasons of the unique combinations recited in such claims.

Applicant has also added new claims 47-52 which are "computer-readable storage medium" versions of claims 13-18. Hence, claims 47-52 should similarly be allowable.

### **CONCLUSION**

It is submitted that the present application is presently in form for allowance. Such action is respectfully requested.

Respectfully submitted,

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